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BY CM/ECF

April 15, 2022

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York

MEMO ENDORSED

RE: *Azor-El, et al. v. City of New York, et al.*, 1:20-cv-03650-KPF (and related cases)
Joint Application to Extend Deadline to Propose Discovery Plan

Dear Judge Failla:

The undersigned represent the parties in these consolidated putative class action cases involving conditions of confinement at Rikers Island during the COVID-19 pandemic. We write jointly to apply to the Court for a 14-day extension of time to propose a discovery plan.

On March 16, 2022, this Court held a hearing on Plaintiffs' Second Motion for Preliminary Injunction. At the hearing, the Court ordered counsel to meet and confer to propose a discovery schedule for the case going forward within 30 days.

Counsel conferred this week and discussed case planning. Given the inherent complexity of class litigation of this type, counsel are going to investigate other similar cases to see what type of discovery plan would appropriately fit this case. In order to conduct the appropriate research and consider the issues, and to further confer, the parties have agreed to request a 14-day extension of time to propose a discovery plan, up to and including April 29, 2022. The parties also agree that it may be productive, before a plan is drafted, to confer with the Court to get the Court's assessment so that the parties are proposing a plan in line with what the Court foresees.

Respectfully submitted,

KEENAN & BHATIA, LLC

N.Y.C. CORPORATION COUNSEL

By: /s/ Sonal Bhatia & E.E. Keenan
Attorneys for Plaintiffs

By: /s/ Chuck Orsland & David Thayer
Attorneys for Defendants

Cc: Counsel of Record (by ECF)

Application GRANTED. The parties shall have until April 29, 2022, by which to submit a proposed case management plan outlining the discovery timeline in this case. The Clerk of Court is directed to terminate the pending motion at docket entry 148.

Dated: April 18, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE